<u>REMARKS</u>

Claims 1, 3-5 and 7-46 are pending. By this Response, claims 1, 3-5 and 7-46 are amended and claims 2 and 6 and are cancelled. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

Applicants appreciate the indication of claims 4, 8-12, 14-20, 25-30, 32-36 and 41-46 as containing allowable subject matter.

The Office Action objects to claims 2-30 and 32-45. Specifically, the Office Action alleges that these claims recite "A pin service" and should recite "The pin service" to be consistent with the scope of the preamble in the independent claims. Applicants respectfully submit that recitation of "A pin service" is consistent with the scope of the preamble of the independent claims. However, to further clarify the independent claims from the dependent claims, applicants have amended these claims to begin with the word "The" instead of "A". Accordingly, withdrawal of the objection is respectfully requested.

The Office Action rejects claims 1-46 under 35 U.S.C. §112 second paragraph as being indefinite. Specifically, the Office Action alleges that claims 2-30 and 32-46 should recite "the tool kit" to be consistent with the independent claims instead of "the pin service tool kit". In response, applicant's have amended the claims in this manner.

Also, the Office Action alleges that it is unclear whether a "head piece having a plurality of pin holes" as recited in claims 2 and 31 is the same as the

tip 252 described in the disclosure. Applicants respectfully submit that the head piece may, for example, be constructed according to the description of the tip 252 described in the disclosure and have amended the claims to clarify such.

Accordingly, in view of the above, applicant's respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. §112, second paragraph.

The Office Action rejects claims 1-3, 5, 24, 31 and 40 under 35 U.S.C. §102(b) as being anticipated by Chisholm (U.S. Patent No. 4,206,543) and claims 6-7, 13, 21-23, 37-39 under 35 U.S.C. §103(a) as being unpatentable over Chisholm. These rejections are respectfully traversed.

Chisholm teaches a pin insertion tool 30 that is used to insert a pin into a wiring board 10. The tool is an elongated tool with a flat seating end 34. The seating end includes a hole therein for holding the pin. Once the pin is placed in the tool, the user can insert the pin into the wiring board 10. The pin is set when the seating end is flat against the board. Chisholm's tool only allows for inserting one pin at a time. See column 4, lines 1-25 and column 5, lines 53-67 to column 6, lines 1-10.

Contrary to Chisholm's teachings, embodiments of the present invention provide a tool kit that includes a pin insertion tool that includes a tip that has a plurality of holes that correspond to a plurality of pin connections on a backplane of a device. The tip allows for the insertion or retrieval of a plurality

of pins at one time. Thus, the tip arrangement provides an advantage over Chisholm's pin tool that can only insert or retrieve a single pin at a time.

The Office Action alleges that element 10 of Chisholm teaches applicants' claimed tip. However, this line of argument is clearly erroneous since Chisholm specifically discloses and illustrates element 10 as being a wiring board. The wiring board is similar to applicants' claimed backplane in which the pins are inserted or retrieved. The wiring board is not a tip for Chisholm's tool. Again, Chisholm's tool only teaches the ability to insert or retrieve a single pin at any given time.

Thus, Chisholm fails to teach or suggest, *inter alia*, a tip having a plurality of pin holes corresponding in arrangement to a plurality of pin connectors disposed on the backplane, said pin holes each adapted to receive a pin insertable into the backplane, as recited in independent claims 1, 30 and 31.

In view of the above, applicants respectfully submit that Chisholm fails to teach each and every feature of the claimed invention as required.

Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

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Conclusion

For at least these reasons, it is respectfully submitted that claims 1, 3-5 and 7-46 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings (Reg. No. 48,917) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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Attachment(s)